

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

DEC 10 2024 12:25 P

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOEL BROWN,

Defendant.

CASE NO. 2:24-cr-00180

JUDGE 3088

INDICTMENT

7 U.S.C. § 2156(b)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(8)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment:

1. An “animal fighting venture” was “any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least 2 animals for purposes of sport, wagering, or entertainment.” 7 U.S.C. § 2156(f)(1).

COUNTS ONE THROUGH ELEVEN
POSSESSING AND TRAINING A DOG FOR USE IN AN
ANIMAL FIGHTING VENTURE
(7 U.S.C. § 2156(b))

2. Paragraph 1 of the Indictment is incorporated here.

3. On or about May 15, 2024, in the Southern District of Ohio and elsewhere,

JOEL BROWN,

defendant herein, did knowingly possess and train a dog for the purpose of having the dog participate in an animal fighting venture, namely:

| Count | Dog ID # |
|-------|----------|
| 1 | G1 |
| 2 | D1 |
| 3 | BY1 |
| 4 | BY2 |
| 5 | BY3 |
| 6 | BY4 |
| 7 | BY5 |
| 8 | BY6 |
| 9 | BY7 |
| 10 | BY8 |
| 11 | BY9 |

All in violation of 7 U.S.C. § 2156(b) and 18 U.S.C. § 2.

COUNT TWELVE
POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

4. On or about May 15, 2024, in the Southern District of Ohio,

JOEL BROWN,

defendant herein, did knowingly, intentionally, and unlawfully possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT THIRTEEN
FELON IN POSSESSION OF A FIREARM
(18 U.S.C. §§ 922(g)(1) and 924(a)(8))

5. On or about May 15, 2024, in the Southern District of Ohio,

JOEL BROWN,

defendant herein, knowing at that time that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Mossberg Model 590M, 12-gauge shotgun, bearing serial number MF12032, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE NOTICE

Firearm – 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461 – Criminal Forfeiture

1. The allegations contained in Count Thirteen of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1), set forth in Count Thirteen of this Indictment, the defendant,

JOEL BROWN,

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense(s), including the firearm listed in Count Thirteen and the following ammunition:

- A Mossberg Model 590M, 12-gauge shotgun, bearing serial number MF12032;

- and all associated ammunition.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), through Title 18, United States Code, Section 924(d)(l).

All pursuant to 18 U.S.C. § 924(d)(l) and 28 U.S.C. § 2461(c).

A TRUE BILL:

s/Foreperson

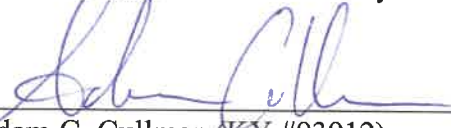
GRAND JURY FOREPERSON

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